

THE KARLIN LAW FIRM LLP
L. Scott Karlin (SBN 90605)
Michael J. Karlin (SBN 272442)
Rex T. Reeves (SBN 136842)
13522 Newport Avenue, Suite 201
Tustin, California 92780
Telephone: (714) 731-3283
Facsimile: (714) 731-5741
lsk@karlinlaw.com; mike@karlinlaw.com;
rex@karlinlaw.com

Attorneys for Defendants
MOHAMED NASSER and ASKANDAR ALI ALMAWORI

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

DARREN GILBERT,

Plaintiff,

vs.

PAUL OIL COMPANY, INC.; MOHAMED
NASSER dba SAM'S MINI MART;
ASKANDAR ALI ALMAWORI dba SAM'S
MINI MART,

Defendants.

Case No. 1:22-cv-00087-DAD-EPG

STIPULATION AND ORDER CONTINUING
MANDATORY SCHEDULING CONFERENCE
AND JOINT SCHEDULING REPORT

(ECF No. 24)

Given the significant progress the Parties have recently made toward settlement in this case, IT
IS HEREBY STIPULATED by and between Plaintiff DARREN GILBERT ("Plaintiff") and Defendants
PAUL OIL COMPANY, INC., MOHAMED NASSER (sued herein as "MOHAMED NASSER dba
SAM'S MINI MART) and ASKANDAR ALI ALMAWORI (sued herein as "ASKANDAR ALI

1 ALMAWORI dba SAM'S MINI MART") (collectively "Defendants") (Plaintiff and Defendants are
2 referred to collectively herein as the "Parties"), by and through their attorneys of record, as follows:

3 The Court may enter an Order continuing the July 12, 2022 Joint Scheduling Report due date and
4 the July 19, 2022 Mandatory Scheduling Conference in this matter, as well as the last date for the Parties
5 to confer further regarding the matters to be addressed in the Joint Scheduling Report, by 28 days or as
6 soon thereafter as pleases the Court. A twenty-eight day continuance will result in the Joint Scheduling
7 Report being due August 9, 2022 and a 10:00 a.m. August 16, 2022 Mandatory Scheduling Conference.
8 This is the third continuance of the foregoing matters requested by the Parties, and is requested in light
9 of the Parties' continuing settlement efforts, which have continued to progress significantly since the
10 Parties last requested continuances of these dates, as discussed below.

13 The Parties believe that good cause exists to enter into this Stipulation and for the Court to issue
14 an Order continuing the aforementioned deadlines. Good cause exists for these continuances for the
15 purpose of reducing fees and costs, as counsel are actively exploring settlement in this action, have made
16 significant progress since their second request to continue the Scheduling Conference and Joint
17 Scheduling Report, and believe that the additional time to investigate this matter and engage in further
18 settlement discussions, while minimizing attorney time expended on this case, that will be afforded by
19 the requested continuances will facilitate, and increase the chances of, early settlement of this matter.
20 The settlement discussions thus far have included the providing of a Certified Access Specialist (CAsp)
21 report regarding the subject premises to counsel for Plaintiff, which has now been reviewed by
22 Plaintiff's counsel, and which has permitted the Parties to recently exchange settlement drafts that leave
23 only a few issues to resolve. It is hoped that, as a result of the requested continuances and additional
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1 time to investigate and negotiate and document a settlement, a settlement as to all claims and all Parties
2 will be reached and documented in this matter shortly.

3 DATED: 7/12/2022

MOORE LAW FIRM, P.C.

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5 By: /s/ Tanya E. Moore
Tanya E. Moore, Esq.
6 Attorneys for Plaintiff
7 DARREN GILBERT

8 DATED: 7/12/2022

CUMMINS & WHITE, LLP

9 By: /s/ J. Thomas Gilbert
J. Thomas Gilbert, Esq.
10 Attorneys for Defendant
11 PAUL OIL COMPANY, INC.

12 DATED: 7/12/2022

THE KARLIN LAW FIRM LLP

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14 By: /s/ Rex T. Reeves
Rex T. Reeves, Esq.
15 Attorneys for Defendants
16 MOHAMED NASSER and
17 ASKANDAR ALI ALMAWORI
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ORDER

Having reviewed the Parties' stipulation (ECF No. 24) and finding good cause to grant the Parties' request, the Joint Scheduling Report is due August 16, 2022, and the Mandatory Scheduling Conference shall be held at 10:00 a.m. on August 23, 2022, and the Parties shall confer further regarding the matters to be addressed in the Joint Scheduling Report no later than 20 days before the Mandatory Scheduling Conference. To participate telephonically, each party is directed to use the following dial-in information: **Dial-in number 1-888-251-2909; passcode 1024453.**

IT IS SO ORDERED.

Dated: **July 12, 2022**

/s/ Eric P. Gray
UNITED STATES MAGISTRATE JUDGE